Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services	)	
And Speech-to-Speech Services for	)	**CC Docket No. 98-67**
Individuals with Hearing and Speech	)	
Disabilities	)	

COMMENTS OF INTRADO INC.

Pursuant to the Public Notice released July 3, 2002, Intrado Inc. (Intrado)[1] hereby submits these comments in response to the Federal Communication Commission's (Commission) proposed clarification of current procedures for routing calls by telecommunications relay services (TRS) centers.[2] Specifically, the Commission seeks comment on a proposal to revise minimum mandatory standards to require TRS providers to transfer emergency calls automatically to the most *appropriate* Public Safety Answering Point (PSAP), rather than the *nearest* PSAP. [3]

For the reasons discussed below, Intrado supports the proposal to require TRS emergency calls to be automatically and immediately transferred to the most *appropriate* (rather than the *nearest*) PSAP. Additionally, Intrado believes that such calls should be delivered to the most *appropriate* PSAP as native 911 calls.

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[1]Founded in 1979, Intrado (NasdaqNM: TRDO) is the nation's leading provider of sophisticated solutions that identify, manage and deliver mission critical information for telecommunications providers and public safety organizations.

[2]"Pleading Cycle Established For Comment on Clarification of Procedures For Emergency Calls at Telecommunications Relay Services (TRS) Centers," *Public Notice*, FCC 98-67, rel. July 29, 2002 (Notice).

[3]*See* 47 C.F.R. Section 64.604 (a)(4).

DISCUSSION

It is common knowledge in the public safety community that the *nearest* PSAP and the *appropriate* PSAP are two distinct concepts. The *nearest* PSAP is the PSAP that is closest in geographic proximity to a particular emergency incident. The *appropriate* PSAP is the PSAP that is responsible for dispatching first responders to an emergency incident. The *appropriate* PSAP may or may not be geographically proximate to the emergency incident. Thus, where *nearest* PSAP denotes geographic proximity, *appropriate* PSAP denotes responsibility.[4]

Routing 911 TRS calls to the *appropriate* PSAP serves the public interest over routing to the *nearest* PSAP for several reasons. First, the jurisdictional boundaries of PSAPs - known as Emergency Service Zones (ESZ) – are determined at the local level by 911 agencies. The ESZ are defined by the jurisdictional boundaries of law enforcement, fire suppression, and emergency medical service, and are not necessarily defined by geography. Thus, a PSAP within a particular ESZ may be the PSAP designated to respond to an emergency call even if the emergency incident occurred closer to another PSAP. [5]

Secondly, the *appropriate* PSAP to respond to an emergency situation that arises across an established jurisdictional or geopolitical boundary may be determined by an inter-local government agreement. For example, assume that an emergency incident occurs on one side of a mountain range, and the PSAP responsible for handling 911 calls in that area is located on the other side of the mountain. While the PSAP on the mountain range's other side might be nearer to the emergency incident, another PSAP, located farther away, may be able to respond more

[4]Additional important concepts include *primary* versus *secondary* PSAPs. A primary PSAP is one that has been designated to handle 911 calls initially. Typically, primary PSAPS are law enforcement agencies or combined dispatch centers. A secondary PSAP is one that handles 911 calls only after they've been handled by a primary PSAP. Secondary PSAPs are typically law, fire, and EMS agencies.

quickly. Inter-local government agreements address such situations and designate primary PSAPs accordingly.

In order to route TRS 911 calls to the *appropriate* PSAP, such calls must be handled as native 911 calls, for the routing databases resident in 911 systems are designed to route 911 calls to the *appropriate* PSAP. Indeed, the 911 routing databases are predicated upon the MSAG and the databases account for and incorporate information about inter-local government agreements. In short, the underlying mechanism to deliver 911 TRS calls to the *appropriate* PSAP exists.

The challenge lies in integrating 911 TRS calls into the native 911 network. In order to process calls through the 911 system, calling party number information is required. Today's TRS systems however, may not be capable of providing the calling party number. TRS systems are generally accessed via toll free telephone numbers and a TRS call center may or may not be equipped to capture calling party number information.[6] Accordingly, TRS service bureaus typically transfer emergency TRS calls to PSAPs via the Public Switched Telephone Network. (PSTN). Because such calls are received by the PSAP over ordinary trunks rather than 911 trunks, the calls are not afforded emergency call handling priority at the PSAP. Moreover, a PSAP may not even answer calls incoming on administrative lines after hours. It is imperative, therefore, that TRS 911 calls be handled as native 911 calls.

Emergency calls made to TRS centers are not dissimilar to emergency calls placed from telematics devices. Currently, telematics calls are routed to a call center where a

[5]Each ESZ represents a unique combination of the three emergency responders listed above. The ESZ is critical to 911 call routing because the ESZ defines the Master Street Address Guide (MSAG) that, along with the telephone number and location, is necessary to build the 911 routing database.

[6]This is true even of TRS systems accessed by dialing 711. With the exception of 911, abbreviated dialing codes generally involve call forwarding arrangements in the telco central office. Thus, when a caller dials 711, the serving end office merely forwards the call to the existing toll free telephone number serving the TRS service bureau. In most cases, calling party number information is not provided in such N11 call forwarding arrangements.

call taker must determine the *appropriate* PSAP based on the caller's location and initiate a conference call over the PSTN to the PSAP's administrative telephone number. The call center must maintain information about PSAPs, but the quality of that information can vary significantly. The telematics and public safety industries are currently developing and deploying solutions to integrate non-traditional emergency calls into the incumbent 911 infrastructure. Emergency TRS calls should be considered as another form of non-traditional communications that need to be integrated into the incumbent 911 infrastructure.

CONCLUSION

Intrado believes that emergency calls placed to a TRS center should be routed to the *appropriate* PSAP rather than *nearest* PSAP. In order to do so, TRS 911 calls must be handled as native 911 calls in the existing 911 infrastructure.

Respectfully Submitted,

/s/_____
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